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28 **UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

19 **In re:**

20 **PG&E CORPORATION**

21 **- and -**

22 **PACIFIC GAS AND ELECTRIC
23 COMPANY,**

24 **Debtors.**

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28 Affects PG&E Corporation
 Affects Pacific Gas and Electric
Company
 Affects both Debtors

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28 * *All papers shall be filed in the Lead Case,
No. 19-30088 (DM).*

19 Case No. 19-30088 (DM)

20 Chapter 11

21 (Lead Case)

22 (Jointly Administered)

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28 **STATEMENT OF THE OFFICIAL
COMMITTEE OF UNSECURED
CREDITORS IN SUPPORT OF THE
DEBTORS' MUTUAL ASSISTANCE
MOTION**

19 Date: July 9, 2019
20 Time: 9:30 a.m. (Pacific Time)
21 Place: United States Bankruptcy Court
22 Courtroom 17, 16th Floor
23 450 Golden Gate Avenue
24 San Francisco, CA 94102
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26 Re: Docket No. 2588
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The Official Committee of Unsecured Creditors (the “Creditors’ Committee”) of PG&E Corp. and Pacific Gas and Electric Company (collectively, the “Debtors”) hereby submits this Statement in Support of the Debtors’ *Omnibus Motion Pursuant to 11 U.S.C. § 365(a), Fed. R. Bankr. P. 6006, and B.L.R. 6006-1 to Approve the Utility’s Assumption of Mutual Assistance Agreements* (the “Mutual Assistance Motion”) [Docket No. 2588].¹

STATEMENT

1. The Creditors' Committee believes that the prospect of a successful reorganization in these cases rests firmly on the Debtors' ability to demonstrate that they can provide power to their customers in a safe, reliable, responsible and sustainable manner. The Creditors' Committee has been, and will continue to be, focused on making sure the Debtors are giving those issues the highest priority.

2. The Mutual Assistance Motion recognizes that the Debtors' efforts in this regard will depend not only on their own safety and mitigation practices, programs and policies, but also on their ability to obtain assistance from outside sources when necessary. Pursuant to the Mutual Assistance Motion, the Debtors seek to secure the continued cooperation and assistance from neighboring utilities (members of the so-called "mutual assistance network") as and when needed to help them promptly respond to future emergency situations.

3. The Creditors' Committee believes that obtaining this cooperation and assistance through the Debtors' ongoing participation in the mutual assistance network is an important component of the Debtors' overall safety program and therefore supports approval of the Mutual Assistance Motion.

¹ Capitalized terms not defined herein have the meanings ascribed to them in the Mutual Assistance Motion.

1 Dated: July 2, 2019
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4 **MILBANK LLP**
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7 /s/ Gregory A. Bray
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10 *Counsel for the Official Committee of
11 Unsecured Creditors*
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